

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

WILLIAM C. BOND

*

Plaintiff

*

v.

*

Civil Action No.: MJG-01-CV-2600

KENNETH BLUM, SR., *et al.*

*

Defendants

*

* * * * *

**DEFENDANTS' RESPONSE IN OPPOSITION TO MOTION TO REFER CRIMINAL ACTS
TO THE US ATTORNEY FOR MARYLAND AND/OR THE DEPARTMENT OF JUSTICE, TO
REFER ATTORNEY MISCONDUCT TO THE MARYLAND ATTORNEY GRIEVANCE
COMMISSION AND TO REFER JUDICIAL MISCONDUCT TO THE CHIEF JUDGE OF
THE FOURTH CIRCUIT**

Defendants, Kenneth Blum, Sr., Kenneth Blum, Jr., Dudley F. B. Hodgson, McDaniel, Bennett & Griffin,¹ and Adelberg Rudow Dorf & Hendler, LLC, by their undersigned counsel, respond in opposition to the Motion to Refer Criminal Acts to the US Attorney for Maryland and/or the Department of Justice, to Refer Attorney Misconduct to the Maryland Attorney Grievance Commission and to Refer Judicial Misconduct to the Chief Judge of the Fourth Circuit ("Motion to Refer Criminal Acts") filed by William Bond ("Bond") and in support state as follows:

1. The Motion to Refer Criminal Acts should be denied because it is utterly without basis. Defendants adopt and incorporate their response in opposition to Bond's Motion for Fed.R.Civ.Pro. 60(b) Relief from Judgment or Order ("Rule 60(b) Motion").
2. Bond does not explain what acts he attributes to any attorney or any defendant that would justify referral to the US Attorney, the Department of Justice or the Attorney Grievance Commission.

¹ "McDaniel, Bennett & Griffin" is currently known as "The Law Offices of William J. McDaniel, Jr.."

3. To justify such a serious request, which could result in dire consequences, it behooves Bond to detail and particularize what he is seeking, for whom he seeks a referral and what specific action or inaction by that individual merits a referral.

4. Here, Bond does nothing more than make a specious request without providing the Court with any reason to grant it. To file this motion without support is a waste of the Court's and the parties' time and resources.

WHEREFORE, Defendants respectfully request that the Motion to Refer Criminal Acts to the US Attorney for Maryland and/or the Department of Justice, to Refer Attorney Misconduct to the Maryland Attorney Grievance Commission and to Refer Judicial Misconduct to the Chief Judge of the Fourth Circuit be DENIED.

_____/s/_____
Gerard P. Martin (Fed Bar No. 00691)
T. Christine Pham (Fed Bar No. 25446)
Rosenberg | Martin | Greenberg, LLP
25 South Charles Street
Suite 2115
Baltimore, Maryland 21201
410.727.6600
410.727.1115 facsimile

Attorneys for Defendants
Kenneth Blum, Sr., Kenneth Blum, Jr., Dudley F.
B. Hodgson

_____/s/_____
William F. Ryan, Jr. (Fed Bar No. 00360)
Amy E. Askew (Fed Bar No. 26709)
Whiteford, Taylor & Preston L.L.P.
Seven Saint Paul Street
Baltimore, Maryland 21202-1626
410.347.8700

Attorneys for Defendant,
McDaniel, Bennett & Griffin

_____/s/_____
Andrew Radding (Fed Bar No. 00195)
Michael Severino (Fed Bar No. 025205)
Adelberg, Rudow, Dorf, & Hendler, LLC
7 St. Paul Street, Ste. 600
Baltimore, Maryland 21201-2927
410.986-0842

Attorneys for Defendant,
Adelberg Rudow Dorf & Hendler LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT on this 11th day of May, 2007, a copy of the foregoing Response in Opposition to the Motion to Refer Criminal Acts to the US Attorney for Maryland and/or the Department of Justice, to Refer Attorney Misconduct to the Maryland Attorney Grievance Commission and to Refer Judicial Misconduct to the Chief Judge of the Fourth Circuit was served by first class mail on the following:

William C. Bond
309 Suffolk Road
Baltimore, Maryland 21218

William Slavin
300 Three Island Boulevard, #810
Hollandale Beach, Florida 33009

_____/s/_____
T. Christine Pham